

OFFICE OF THE COMMISSIONER

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November 1, 2001

MCS 01.033

Mr. John Iani
Regional Administrator
U.S. EPA, Region X
1200 Sixth Avenue
Seattle, WA 98101

Dear Mr. Iani:

Chuck Findley's letter of September 18, 2001 requested that Alaska provide a schedule for issuance of the outstanding Alaska Title V air operating permits.

As you are aware, Alaska's electric power network is comprised of a large number of stand alone generating systems in rural Alaska, with power integration along the railbelt portion of the state. This fact, along with the non-urban setting of many of our industrial activities, results in a relatively large number of facilities that are subject to the Title V permitting requirements of the Clean Air Act.

Of the 471 Alaska facility installations that are subject to Title V requirements, 282 are now operating under a fast track method, such as a Title V general permit, or a legally enforceable owner-requested limit to avoid the permitting requirements. The remaining facilities all require individual Title V permits. As of this date, approximately 61 individual permits have been issued, while 128 remain to be prepared and issued.

The following table provides a schedule for issuance of the outstanding permits. This schedule is based upon our current funding and staffing level; any significant change in either of these elements will, of course, change our schedule.

Schedule and Milestones for Alaska's Outstanding Title V Air Permits (as of 10/25/01)

Date	Cumulative Number of New Permits Issued
June 30, 2002	44 permits
December 31, 2002	87 permits
June 30, 2003	112 permits
November 30, 2003	128 permits

My staff can commit to the above schedule without significantly impairing other essential functions of the air quality program. A more aggressive schedule would require shifting personnel from other duties (e.g. compliance) to permit writing, or require us to employ additional contract resources.

If your staff wishes to discuss this schedule or the possibility of a more aggressive schedule, they should contact John F. Kuterbach, manager of our Air Permits Program, at (907) 465-5103, or by email at john_kuterbach@envircon.state.ak.us. I look forward to hearing from you about this schedule and about any other potential program problems that may impact your pending final approval of Alaska's Title V operating permits program.

Sincerely,

Michele Brown
Commissioner

cc: Denise Baker, Office of Air Quality, EPA Region 10
Tom Chapple, Director Air and Water Quality, DEC